

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

MARION MISIAK and MARY BETH MISIAK,)	
Plaintiffs,)	
)	NO: 07 C 6330
vs.)	
)	Judge Darrah
MORRIS MATERIAL HANDLING, INC.,)	
a Foreign Corporation d/b/a P&H CRANES,)	Magistrate Judge Nolan
P&H CRANES, Individually and as a Division)	
of MORRIS MATERIAL HANDLING, INC.,)	
WHITING CORPORATION, a Foreign)	
Corporation, HUBBELL INCORPORATED, a)	
Foreign Corporation d/b/a GLEASON REEL)	
CORP., and GLEASON REEL CORP., a Foreign)	
Corporation a/k/a GRC INTERNATIONAL,)	
Individually and as a Division of HUBBELL)	
INCORPORATED,)	
Defendants.)	

EMERGENCY MOTION TO CONTINUE INSPECTION

Defendant, Morris Material Handling, Inc. f/k/a SPH Crane & Hoist, Inc. d/b/a Morris Material Handling, by and through its attorneys, JOHNSON & BELL, LTD., for its Emergency Motion to Continue Inspection, states as follows:

1. The parties have scheduled an inspection of the crane which is the subject of this lawsuit for June 24, 2008 at the premises of Union Tank Car.
2. Union Tank Car has objected to attorneys JOHNSON & BELL, LTD.'s representation of said Defendant and has filed a Motion to Disqualify the firm of JOHNSON & BELL, LTD. Union Tank Car has advised counsel that it will not allow any attorney from JOHNSON & BELL, LTD. to attend the inspection until after ruling on the Motion to Disqualify.
3. The Motion to Disqualify has been fully briefed but the court has yet to rule.

4. Defendant, Morris Material Handling, Inc. f/k/a SPH Crane & Hoist, Inc. d/b/a Morris Material Handling fears it will be prejudiced should the inspection proceed before the court rules on the Motion to Disqualify.

WHEREFORE, Defendant, Morris Material Handling, Inc. f/k/a SPH Crane & Hoist, Inc. d/b/a Morris Material Handling, prays this Honorable Court enter an order continuing the inspection to a date after the Court's ruling on Union Tank Car's Motion to Disqualify.

Respectfully submitted,

JOHNSON & BELL, LTD.

/s/ Thomas J. Andrews

One of the Attorneys for Defendant, Morris Material Handling, Inc. f/k/a SPH Crane & Hoist, Inc. d/b/a Morris Material Handling,

Thomas J. Andrews, Esq.
Joseph B. Carini, Esq.
Joshua S. Singewald, Esq.
JOHNSON & BELL, LTD.
33 West Monroe Street
Suite 2700
Chicago, Illinois 60603
(312) 372-0770
#1885839